

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

María A. Clemente Rosa
PETICIONARIA

V.

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO

As representative of

THE COMMONWEALTH OF PUERTO RICO,
et a., Debtor.

15 de abril DE 2022

PROMESA TITLE III

No. 17 BK 3283- LTS

CLAIM. NÚM. 133537

TO THE HONORABLE BOARD THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE
COMMONWEALTH OF PUERTO RICO, et al., Debtors:

HONORABLE JUDGE: OF THE UNITED STATES DISTRICT COURT HON. LAURA
TAYLOR SWAIN.

UNITED STATES DITRIT COURT FOR THE DISTRICT OF PUERTO RICO/ COURT
OF THE UNITED STATES DISTRICT FOR THE DISTRICT OF PUERTO RICO.

REPETUOUSLY REQUEST:

MOTION TO GUARANTEE ME PAYMENT FOR DAMAGES CREATED BY THE
DEBTOR: THE COMMONWEALTH OF PUERTO RICO AND THE DEPARTMENT OF
EDUCATION, IN ITS ENTIRETY. ACCORDING TO THE CLAIMS SUBMITTED TO THE
PROMESA III LAW ON JUNE 29, 2018, CLAIM NO. 133537. CASE NUMBER: 17BK
03283-LTS - FOR THE AMOUNT OF THE CLAIM OF \$250,000.00: WHEN THE TIME
COMES FOR THE JUDGMENT DECLARED BY THE HON. JUDGE. OF THE UNITED
STATES DISTRICT COURT HON. LAURA TAYLOR SWAIN AND THE APPROVAL OF
THE DEBT JUSTICE PLAN (PAD).

María A. Clemente Rosa appears, PETITIONER, CLAIM NO. 133537. CASE NUMBER: 17BK 03283-LTS respectfully addresses, exposes, alleges and requests:

ACTS

AFFIRMATIVE DATA

1. For the year 1985, I signed a contract as a teacher with the Puerto Rico Public Education System, in the Industrial Arts Category, currently a Technology Teacher, Certificate No. 1662 and Position No. R 16045. That I have worked for more than 34 years of teaching.
2. During 34 years of public service, I have served as a teacher of excellence and have acquired a Doctoral degree in the area of education. I have participated in different technology competitions, leading students to obtain prizes.
3. As part of my pension, I have contributed to the Teachers' Retirement System.
4. That during 34 years of public service, my rights to receive benefits have been violated by Law 96, which establishes increases not granted for professional training, "Master" level.
5. Violation of Law 96, increase not granted by former Governor Hon. Sila María Calderón.
6. Violation of the payment of Law No. 9 signed on March 7, 2022. (P. del S. 573); 2022, Law 9. Law to amend several laws and order the payments owed from Fiscal Year 2014-2015 in accordance with the Law of the Teaching Career, as amended.
7. That as of today, April 15, 2022, the Department of Education continues to violate the rights of teachers who comply with the Teaching Career Law. Since they are now violating Law No. 9 signed on March 7, 2022, by the Hon. Pedro Pierluisi, to comply with the payments of the Teaching Career for the years 2014-2015. And the Department of Education has apparently created a PDF, to pay their select group. Without having made any disclosure of the Payment of Law No. 9. On the contrary, it is not accepting that the Master appears at his Budget Offices to be noted and that the Amount owed be accounted for. As established by the Hon. Governor of Puerto Rico, Pedro Pierluisi.
8. This apparent action on the part of the Office of Human Resources of the Department of Education, to create a PDF Document, with the name of people with the tabulation of the Payment of the Teaching Career without having mediated any Disclosure for the teachers of all the Regions of Puerto Rico and send it to the Budget Office of the Federal Offices of the Department of Education, to Mr. Cruz - Hernández, It is an action that does not reveal any transparency between

the agreements between the Government of Puerto Rico and the Fiscal Control Board , to comply with the Debt Adjustment Plan, by the Promise Law.

9. Violation of Law 89, steps not granted to teachers of the Public Education System.

10. Violation of Law 96, Violation of not paying acquired rights, by the Bankruptcy Law. Violation of the Constitution of Puerto Rico.

11. Violation of Law 164, improper discounts, by the Retirement System for Teachers and public employees.

12. Violation of Law 158, increase not granted by the Teaching Career Law, violation of Law 158, the Constitution and deception, to the teacher. Amended by Law No. 9 of March 7, 2022, signed by Hon. Pedro Pierluisi.

13. RESPECTFULLY HONORABLE JUDGE, Laura Taylor Swain, I FIND MY REQUEST FOR A CLAIM PAYMENT MADE ON JUNE 29, 2018, TO BE FAIR, ADEQUATE AND REASONABLE.

I come to you, Hon. Hon. Laura Taylor Swain. Judge, United States District Court and TO THE HONORABLE BOARD THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH PF PUERTO RICO, et al., Debtors: UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO because I understand that they have the principal basis of the primary jurisdiction of my claim.

14. Acknowledging said act, I request this honorable forum to impose a legal remedy aimed at compensating damages caused by the DEBTOR, THE Commonwealth of Puerto Rico, the Government of Puerto Rico and the Department of Education, and its Dependencies and that I am awarded damages and payment of interest in the amount of \$250,000.00 as stipulated in the claim and the payment of costs and attorneys' fees.

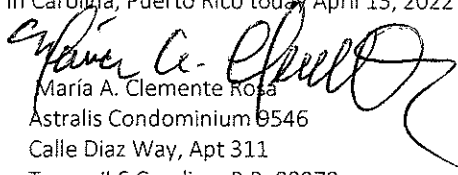
FOR ALL WHICH, the petitioning party very respectfully requests the Hon. Laura Taylor Swain. Judge, Of the United States District Court and TO THE HONORABLE BOARD THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH PF PUERTO RICO, et al., Debtors: who is aware of the foregoing, hereby declares the motion of: (SO THAT I BE GUARANTEED TO PAY FOR DAMAGES CREATED BY THE DEBTOR THE COMMONWEALTH OF PUERTO RICO IN ITS ENTIRETY, ACCORDING TO THE CLAIMS SUBMITTED TO THE PROMESA III LAW ON JUNE 29, 2018, CLAIM NO. 133537. CASE NUMBER:

17BK 03283-LTS - FOR THE AMOUNT OF THE CLAIM OF \$250,000.00, IN ITS ENTIRETY, WHEN THE
TIME COMES FOR THE JUDGMENT DECLARED BY THE HONORABLE JUDGE Laura Taylor Swain.
CLAIM: CLAIM NUM.: 133537.

RESPECTFULLY REQUESTED.

I CERTIFY that on this same date I have sent by CERTIFIED mail a true and exact copy of this TO
THE HONORABLE BOARD THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO
RICO, as representative of THE COMMONWEALTH PF PUERTO RICO, et al., Debtors:

In Carolina, Puerto Rico today April 15, 2022


María A. Clemente Rosa
Astralis Condominium 9546
Calle Diaz Way, Apt 311
Tower # 6 Carolina, P.R. 00979
Phone (787)385-2906

Date Filed: 6/29/2018
Case Number: 17 BK 03283-LTS
DEBTOR: Commonwealth of Puerto Rico
CLAIM: NO.: 133537
ASSERTED CLAIM AMOUNT: 250,000.00

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

María A. Clemente Rosa
PETICIONARIA

V.

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO

As representative of

THE COMMONWEALTH OF PUERTO RICO,
et al., Debtor.

2 de mayo DE 2022

PROMESA TITLE III

No. 17 BK 3283- LTS

CLAIM. NÚM. 133537

TO THE HONORABLE BOARD THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE
COMMONWEALTH PF PUERTO RICO, et al., Debtors:

HONORABLE JUEZ: UNITED STATES DITRIT COURT, HON. LAURA TAYLOR
SWAIN.

UNITED STATES DITRIT COURT FOR THE DISTRICT OF PUERTO RICO.

REPETUOUSLY REQUEST

MOTION

HON. JUDGE LAURA TAYLOR SWAIN, I ASK YOUR BENEVOLENCE TO
RESPECTFULLY REQUEST AND REQUEST YOUR INDULGENCE, SO THAT THE
APPLICATIONS PRESENTED HERE HUMBLY BE CONSIDERED AND I MAY BE EXCUSED
AND GIVE ME THE OPPORTUNITY TO ACCEPT THE MOTION OF APRIL 15, 2022,
NOTWITHSTANDING. WHICH I PRESENTED IN THE SPANISH LANGUAGE; NOW
TRANSLATED INTO THE ENGLISH LANGUAGE, BY ME, WHO AM THE CREDITOR
PETITIONING PARTY AND DO NOT HOLD ANY CERTIFICATION OF A CERTIFIED
TRANSLATOR BY THE UNITED STATES FEDERAL COURT.

RESPECTFULLY CONSIDERING THE STATUTES OF THE GENERAL ORDER: OF THE
UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO. MISC. NO 13-
218(ADC), ORDERED BY THE HON. UNITED STATES CHIEF DISTRICT JUDGE. HON.
AIDA M. DELGADO-COLÓN AND I QUOTE: "THUS ORDERED IN SAN JUAN, PUERTO

RICO, And THIS MAY 22, 2013. AIDA M. DELGADO-COLÓN, UNITED STATES CHIEF DISTRICT JUDGE”.

María A. Clemente Rosa appears, PETITIONER, CLAIM NO. 133537. CASE NUMBER: 17BK 03283-LTS respectfully addresses, exposes, alleges and requests:

RELATIONSHIP OF FACTS:

1. Honorable Judge Laura Taylor Swain, respectfully addresses you hereby express my sincere apology for addressing in my Motion of April 15, 2022, in the Spanish language, to the Honorable Judge, Laura Taylor Swain, to the Honorable Court of the Federal Court of the United States and the Representatives of The Commonwealth Of Puerto Rico et al., The Financial Oversight And Management Board For Puerto Rico.

2. The Petitioner María A. Clemente Rosa addresses you very respectfully, to express to you, Honorable Judge Laura Taylor Swain, the reason why I wrote the Motion of April 15, 2022, in the Spanish language, was because I considered the GENERAL ORDER, OF THE UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO. MISC. NO. 13-218(ADC). State and I quote:

a. “In the matter of:

By Person not certified as Spanish-English

Federal Court Interpreters by the Administrative Office of the United States Courts.”

b.”Clarifying Exemption from certification by a federally certified Interpreter as provided in Local Civil 5(g).

c. It is also stated and I quote: “It has come to the attention of the Court that litigants rely more often on non-certified translations of documents”.

d. Hon. Judge Laura Taylor Swain, I respectfully submit that the UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO GENERAL ORDER. MISC. NO. 13-218(ADC). Set the following and I quote: “In the matter of:

Local Civil Rule 5(g) of the Local Rules of the United States District Court for the District of Puerto Rico establishes that: All documents that are not in the English language that are presented or presented, either as evidence or otherwise, they must be accompanied by a certified English translation prepared by an interpreter certified by the Administrative Office of the United States Courts. All parties may waive the certification of a federally certified interpreter. See Appendix A.

3. Hon. Judge Laura Taylor Swain, I respectfully present that before these postulates indicated under the General Order, OF THE UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO. MISC. NO 13-218 (ADC), is that I justify the reason why I did not send the Motion of April 15, 2022, in English, because I understood that I was violating said General Order, I would be in Perjury, because I, not I have no translator certification, certified by the Federal Court, of the United States.

4. Hon. Judge Laura Taylor Swain, I appeal to your benevolence and respectfully request your indulgence, so that you humbly consider the postulates presented here and give me the opportunity to accept the Motion that I present in the Spanish language on the 15th of April 2022, without prejudice, now translated into the English language, by me, who am the petitioning party and do not hold any United States Federal Court Certified Translator Certification. Considering the Statutes of the General Order: DE UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO. MISC. NO 13-218(ADC),

5. Hon. Judge Laura Taylor Swain, respectfully addresses you once again to request your indulgence and accept my Motion, which is humbly addressed to request the payments and interest owed by the Commonwealth Agencies, Retirement System, Department of Education, State Insurance Fund and others. Debts and claims established for payments under the approval of Law 106-2017, known as the "Law to Guarantee Payment to Our Pensioners and Establish a New Defined Contribution Plan for Public Servants." And other laws that are coming into force this year, to comply with the Debt Adjustment Plan.

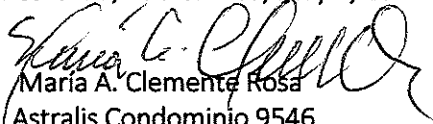
6. Laws such as: Law No. 9 signed on March 7, 2022. (P. del S. 573); 2022, Law 9. Law to amend several laws and order the payments owed from Fiscal Year 2014-2015 in accordance with the Law of the Teaching Career, as amended.

7. I turn to your Benevolence, Hon. Laura Taylor Swain. Judge, United States District Court and TO THE HONORABLE BOARD THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH PF PUERTO RICO, et al, . Debtors: UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO, to grant me your indulgence and accept the Motion filed today May 2, 2022 and Motion of April 15, 2022, written in the English Language, now translated into English by the petitioning party.

RESPECTFULLY REQUESTED.

I CERTIFY that on this same date I have mailed a true and exact copy of this TO THE HONORABLE BOARD THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH PF PUERTO RICO, et al., Debtors:

In Carolina, Puerto Rico, May 2, 2022



Maria A. Clemente Rosa
Astralis Condominio 9546
Calle Díaz Way, Apt. 311
Tower # 6 Carolina, P.R. 00979

Phone (787)385-2906
Email: clero_62@yahoo.com

Date Filed: 6/29/2018
Case Number: 17 BK 03283-LTS
DEBTOR: Commonwealth of Puerto Rico
CLAIM: NO. 133537